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| In The Matter Of: | ) | |
| Digital Audio Broadcasting Systems And Their Impact On The Terrestrial Radio Broadcast Service | ) | MM Docket No. 99-325 |

I respectfully submit these Comments to the *Further Notice of Proposed Rulemaking* in the above captioned proceeding, regarding conversion of AM and FM broadcasting to the IBOC digital broadcasting system. I write in support of the recommendations made by the National Association of Broadcasters ("NAB") encouraging the Commission to allow radio station operators greater flexibility in the conversion to digital radio broadcasting ("DAB") by authorizing stations to convert to DAB broadcasts using separate antennas. The Engineering Report upon which the NAB proposal is based demonstrates that the two-antenna configuration which the NAB supports will provide a significantly more cost-effective conversion option for small broadcasters.[1]

The Commission stated that one of its primary goals in switching to digital broadcasting was to "ensure that the introduction of DAB does not weaken the vitality of our free, over-the-air broadcast service, which provides service to virtually all Americans through a strong, independent system of privately owned and operated stations."[2] The NAB Engineering Report demonstrates that allowing broadcasters to implement a separate antenna system will significantly reduce the cost of conversion to digital broadcasting. The plan will allow radio broadcasters to continue broadcasting analog

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[1] *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service,* 17 FCC Red. 19990 (2002)

[2] *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service, Notice of Proposed Rulemaking,* WT Docket No. 99-325, FCC 99-327 (rel. November 1, 1999).

signals through existing radio towers and simply add a second tower to send the digital signal. Small broadcasters will be able to more easily add a digital transmitter that is appropriately sized for their needs. As the Engineering Report indicated, under the current plan, a small 10 Kilowatt station would have to spend, at a minimum, $60,000 to install a single antenna capable of sending out a 100 Watt digital signal. By allowing stations to use a two antenna approach, a station could instead spend $20,000 installing a second antenna capable of sending a similarly strong digital signal. The significant savings which would result from the two antenna system will allow smaller, independently owned broadcasters to allocate the savings toward upgrading their broadcasting operations in anticipation of the Commission's eventual conversion to all digital broadcasting.

For the foregoing reasons, I respectfully encourage the Commission to accept the NAB's recommendation and authorize broadcasters to adopt separate antenna implementations for conversion to digital broadcasting.

Respectfully submitted,

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